

# EXHIBIT 34

Case:17-03283-LTS Doc#:18070 Filed:09/09/21 Entered:09/10/21 15:41:53 Desc: Main  
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Claim number: **171214**  
August 31, 2021

**SUBJECT:** Request for Reply

Agustín González Velázquez  
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Patillas, PR 00723  
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United States District Court  
For the District of Puerto Rico  
Commonwealth of Puerto Rico  
Claim number 171214

The reason why I oppose the omnibus objection consists of the *NUNC PRO TUNC* Judgment issued in the Case KAC96-1381. In light of this matter, I do not agree with the objection, as there is a prior ruling issued by the San Juan Judicial Center. Among the cases that I am claiming is the *Alfredo Maldonado Rodríguez et al. v. Zoé Laboy Alvarado*, et al. matter. I am also claiming the denial of the Puerto Rico Retirement System, under claim number 171214. This number applies in both cases. The [amount] of the claims consists, first, of \$20,000, relating to that of Alfredo Maldonado Rodríguez, while the second claim consists of an amount of \$30,000 applicable to the Puerto Rico Retirement System. Therefore, I am requesting a review of cases so that the appropriate decision may be made.

I am enclosing a copy of the *Nunc Pro Tunc* Judgment issued in Case No. KAC96-1381.

Sincerely,

[Signature]  
Agustín González Velázquez

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**Proof of Claim Number: 171214**

**Plaintiff: González Velázquez, Agustín**

**INFORMATION REQUESTED IN ORDER TO PROCESS YOUR CLAIM**

**Instructions**

Answer the four (4) applicable questions and sub-questions. Include the as much detail possible in your answers. **Your answers must provide more information than is included in the initial proof of claim.** By way of example, if you previously wrote “Act 96” as the basis for your claim, please now explain on which specific laws you purport to rely, the year in which the law in question was passed, and how and why you believe this law in particular constitutes grounds for your claim. Furthermore, if available and applicable to your claim, provide:

- A copy of an initial pleading, such as, for example, a Complaint or Answer;
- An unpaid judgment or settlement agreement;
- Written notice of your intention to file a claim with record of sending by mail;
- All documentation that, in your opinion, supports your claim.

Send the completed form and supporting documents by **email** to [PRClaimsInfo@primeclerk.com](mailto:PRClaimsInfo@primeclerk.com), or by **mail or by hand delivery** to the following addresses:

<b><u>By Mail</u></b>	<b><u>Hand Delivery or Overnight Mail</u></b>
Commonwealth of Puerto Rico Supplemental Information Processing Center c/o Prime Clerk LLC Grand Central Station, PO Box 4708 New York, NY 10163-4708	Commonwealth of Puerto Rico Supplemental Information Processing Center c/o Prime Clerk LLC 850 Third Avenue, Suite 412 Brooklyn, NY 11232

**Questionnaire**

**1. What are the grounds of your claim?**

- ☒ A pending or concluded legal action with the government of Puerto Rico or against it
- ☐ Current or previous employment with the government of Puerto Rico
- ☐ Other (indicate in as much detail as possible. Attach additional pages if necessary.)

See enclosure

**2. What is the amount of your claim (how much money do you claim you are owed)?**

See enclosure

**Batch 8**



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**Proof of Claim Number: 171214**

**Plaintiff: González Velázquez, Agustín**

**3. Employment. Is your claim related to current or previous employment in the government of Puerto Rico?**

☐ No. Continue to question 4.

☒ Yes. Answer questions 3(a)-(d).

3(a). Identify the specific agency or department in which you work or worked:

Department of Corrections and Rehabilitation

3(b). Identify the dates of your employment in relation to your claim:

I started on July 05, 1977, until October 30, 1996

3(c). Last four digits of your social security number: 0381

3(d). What is the nature of your employment claims (select everything that applies):

☐ Retirement

☒ Unpaid wages

☐ Sick days

☐ Union grievance

☐ Vacation

☒ Other (Provide as much detail possible. Attach additional pages if necessary).

See enclosure

**4. Legal action. Is your claim related to a pending or concluded legal action?**

☐ No

☒ Yes. Answer Questions 4(a)-(f).

4(a). Identify the department or agency that is part of this action.

Department of Corrections/Department of Justice

4(b). Identify the name and address of the court or agency where the action is pending:

Trial Court, San Juan Vicinaje, P.O. Box 190887 San Juan PR 00919-0887

4(c). Case number: Civil Case No. KAC 96-1381

4(d). Title, heading, or case name:

Alfredo Maldonado Rodríguez et al. v. Zoe Laboy Alvarado et al.

Batch 8

2



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**Proof of Claim Number: 171214**

**Plaintiff: González Velázquez, Agustín**

4(e). Case status (pending, under appeal, or closed):

*Nunc Pro Tunc Judgment; subsequent procedures needed*

4(f). Do you have an unpaid judgment? ☒ Yes / No (Mark one)

If so, what is the date and amount of the ruling?

*June 28, 2002. Amount owed yet to be determined, see Answer to Question # 2.*

**Batch 8**

3



990123400446418

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COMMONWEALTH OF PUERTO RICO  
TRIAL COURT  
SAN JUAN SUPERIOR COURT

ALFREDO MALDONADO RODRIGUEZ et al. Plaintiffs, v. ZOE LABOY ALVARADO et al. Defendants.	CIVIL CASE NO.: KAC96-1381 KAC97-0144 KAC98-0530 KAC98-0531 (JOINED) IN RE: DECLARATORY JUDGMENT
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NUNC PRO TUNC JUDGMENT

The plaintiffs claim the payment of the salary raises and step increases based on their time in active service, some in the Puerto Rico Corrections Administration, and others in the Puerto Rico Firefighters Corps, as the case may be, during the periods of time required and set forth in the laws on which their claim is based, and under which the stipulated salary increases or benefits have not been paid to them.

As a result of the Status Conference held on this matter on April 4, 2000, the Court issued and indicated how it would rule in the case, stating that there was an agreement between the parties and specifying the guidelines and law applicable to the case.

Having analyzed and evaluated the case records and the applicable laws, the following Ruling is issued:

1. The claim asserted by the plaintiffs in this case is granted as it is found that they are entitled to the salary increases and benefits for active service, as stipulated by law, in the cases in which they have still not had acknowledgment of or not received the corresponding payment.

2. It is ordered that the defendants and the plaintiffs analyze each plaintiff's claim in the case, pursuant to the laws, guidelines and applicable law as set forth, to determine whether or not the [amount owed to them] has been acknowledged or they have received the payments to which they are entitled. In the cases in which the [amount owed to them] has not been acknowledged and/or they have not received payment, the total amount due as of the date of the report must be indicated for each plaintiff.

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3. The laws applicable to the above-captioned matter are found to be:

- |                      |   |   |
|----------------------|---|---|
| 1. July/12/1979      |   | Salary increase equivalent to a rate or step increase corresponding to Act 89                               |
| 2. July/01/1974      | \$50.00   | Amendments to the Classification and Compensation Plans, Equal Pay Regulations of June 07, 1984, as amended |
| 3. July/01/1977      | \$30.00   | Compensation Plan Revision, <i>supra</i>  |
| 4. July/01/1979      | See standards   | Increase under Act 3  |
| 5. July/01/1980      | See standards   | Compensation Plan Revision, <i>supra</i>  |
| 6. October/01/1983   | \$30.00   | Increase under Act 12 of August 27, 1982  |
| 7. April/01/1984     | See standards   | Compensation Plan Revision, Act 84 of June 03, 1983   |
| 8. October/01/1986   | \$55.00   | Increase under Act 90 of July 09, 1986  |
| 9. November/01/1986  | \$35.00   | Compensation Plan Advance, <i>supra</i>   |
| 10. January/01/1987  | See standards   | Classification and Compensation Plan Revision, <i>supra</i>   |
| 11. April/01/1988    | \$40.00   | Increase under Act 1 of February 09, 1988   |
| 12. July/01/1990     | \$50.00   | Increase under Act 7 of May 07, 1989  |
| 13. December/01/1991 | A minimum of \$30 was ensured for Custody Officials and \$20 for civil servants | Compensation Plan Revision, <i>supra</i>  |
| 14. July/01/1993     | \$100.00  | Act 26 of July 23, 1993, Classification adjustment for Custody Officials and Prison Social Workers          |

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15. [Illegible]	\$100.00	[Illegible]
16. July/01/1988	\$180.00	Act 178 of August 12, 1995; September 01, 1994 Federal <i>[illegible]</i> regarding "Custody and Prison Social Workers", Classification adjustment for Custody Officials and Prison Social Workers
17. July/01/1995	\$200.00	Order of the Administrator and OPG – Increase for Regional Superintendents and Supervisors
18. August/01/1995	\$125.00	Increase for Productivity and Efficiency of civil servants with one year or more in the Administration and excellent or good productivity
19. November/01/1995	\$60.00	Act 124 of August 09, 1995 (transitional and regular <i>[employees]</i> )
20. October/01/1997	\$100.00	Compensation Plan Advance for Administrative and Support Personnel
21. April/01/1998	\$100.00	Compensation Plan Advance for Custody Officials and Prison Social Workers
22. July/01/1999	\$100.00 or less	Compensation Plan Advance, <i>supra</i>

4. Defendants' counsel, together with Plaintiffs' counsel, shall prepare and submit to the Court calculation and settlement sheets indicating the amounts to be paid to each plaintiff, following the guidelines and the law applicable to the case. Upon filing the originals of the calculation and settlement sheets with the Court, the defendants, through the Puerto Rico Corrections Administration, or the Puerto Rico Firefighters Corps, as the case may be, shall notify Plaintiffs' counsel, serving a copy of said calculation and settlement sheets.



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5. The defendants shall prepare and file the payrolls needed to make the payment to the plaintiffs with the court, providing a copy to Plaintiffs' counsel. The payrolls shall contain: (a) the names and other identification of the plaintiffs; (b) the total owed and to be received by each plaintiff in the lawsuit; (c) the amount withheld for the retirement payment of each plaintiff; (d) the amount withheld for social insurance; (e) the amount withheld for income tax; (f) the amount withheld for fees; (g) the net amount corresponding to each plaintiff and acknowledged due to them by the Court Clerk's Office.

6. Once the aggregate individual amount, if any, of the claims' total is determined, said amount shall be allocated in the budget of the defendant agency. In order to do so, the acknowledgment of funds contemplated in the stipulation should be made, with the payment to the plaintiffs also being made. Should the parties agree to it, the payment may be made in an expedited manner. Any other payment form or system different from that indicated herein agreed upon by the parties shall be reported jointly in writing by the parties' attorneys.

7. The plaintiffs are entitled to legal interest on the amount of the judgment, at the annual percentage rate set by the Financial Board, from the date of this judgment, until it is paid. Therefore, it is in the interest of the Commonwealth of Puerto Rico for the payment to be made as soon as possible.

TO BE FILED AND SERVED.

ISSUED in San Juan, Puerto Rico, on *June 28, 2002*

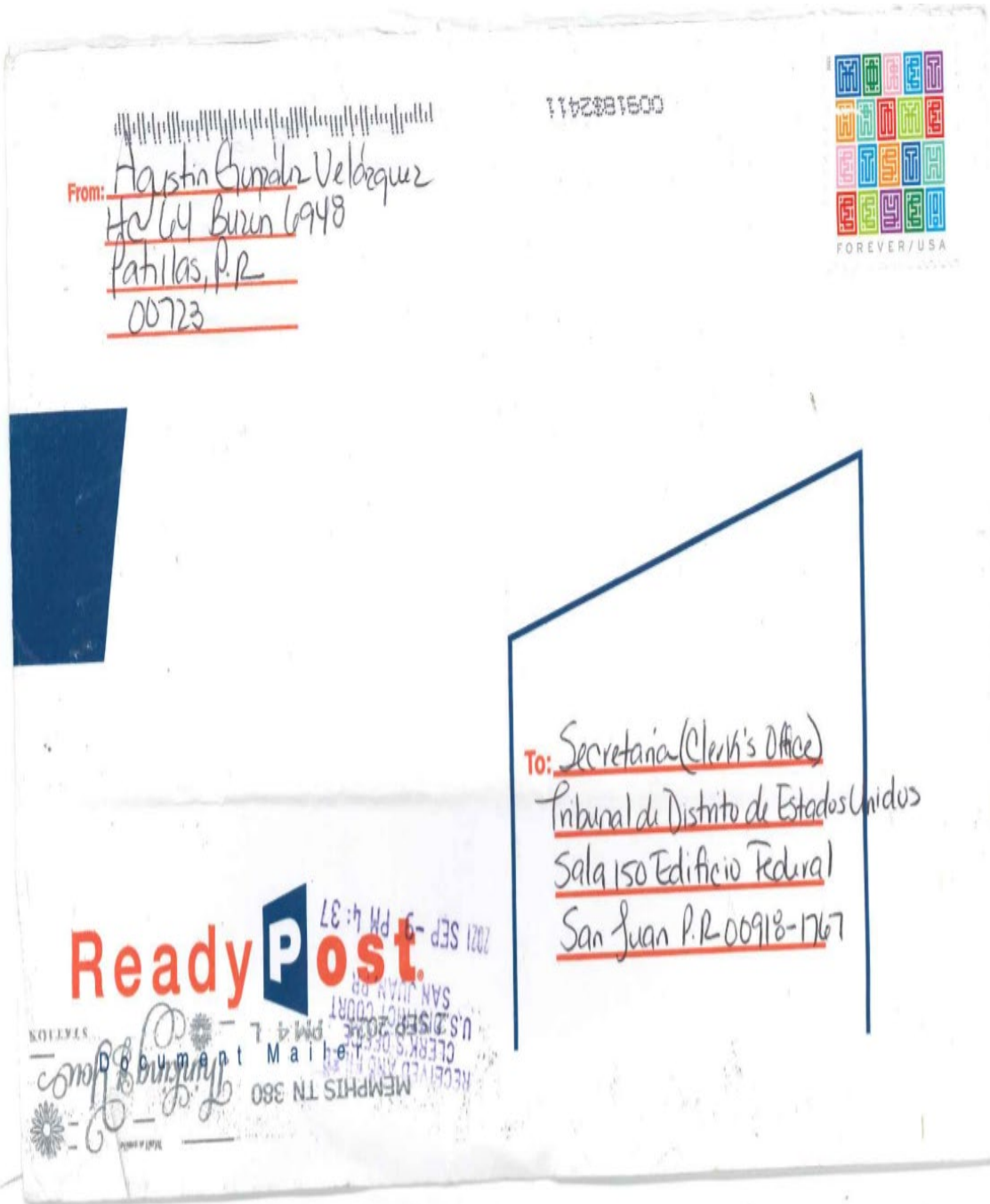
[Signature]

[Stamp: I CERTIFY  
– CLERK – [Illegible  
Name] – DEPUTY  
CLERK]

**JUDGE OF THE SUPERIOR COURT**

[Stamp: MIGUEL J. FABRE RAMÍREZ –  
JUDGE OF THE SUPERIOR COURT]

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### TRANSLATOR'S CERTIFICATE OF TRANSLATION

Translation from: Spanish (Puerto Rico) into English (US)

TARGEM Translations Inc.

I, Andreea I. Boscor, ATA-certified Spanish-English #525556, acting as translator at TARGEM Translations Inc., a NEW YORK City corporation, with its principal office at 185 Clymer Street, Brooklyn, NY, 11211, USA, certify that:

the English translated document is a true and accurate translation of the original Spanish and has been translated to the best of my knowledge.

Original Document Name: **Claim No. 171214 DN 18070**

Signed this 23<sup>rd</sup> day of December 2021



Verify at [www.atanet.org/verify](http://www.atanet.org/verify)

A handwritten signature in blue ink, appearing to read 'Andreea I. Boscor', written over a horizontal line.

Andreea I. Boscor

